

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. No new claims have been added. Claims 1-16 remain pending.

Applicants wish to thank Examiner A. Queler for the courtesies that he extended during a personal interview on March 23, 2004. At the interview, Examiner Queler indicated that additional details of the “event-driven program” as recited in claim 1 was necessary. Claims 1 and 8 have been amended as per Examiner Queler’s suggestions.

Support for the claim amendments can be found throughout the specification. For example, the specification discloses an event driven server model (page 15, line 28 – page 19, line 24), designing of documents that are transported across the server/client transition (page 16, lines 15-16), while composition space 1002 remains a serial execution environment 1005, the present invention provides an event driven model 1006 to ride on top of the serial environment 1005 so as to present the appearance of an event driven model to the designer when designing in the design space (page 16, lines 17-20), scripting environments 1002 and 1003 is kept hidden from the designer (page 16, lines 26-27), conceptual objects moving between the various spaces (page 17, lines 2-3), “while the event model handles the complex coding to create the simplistic appearance of the transitioning object. The complex coding underlying the event model and the representation of an object moving between spaces is treated in greater detail below” (page 17, lines 13-15), “the representation of text box 1023 is not a listing of HTML code, but rather a visual representation of the text box (in this example, a box with text in it)” (page 17, lines 27-29), hiding of the code of the text box allows the designer (page 18, line 2), design time control inherits information from its inclusion on page 1021 (page 18, lines 6-7), a property value can be

set, ... whether to be scripted on the server or scripted on the client for the handling of an event (page 18, lines 18-19).

Claims 1-16 were rejected under 35 U.S.C. 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected to make and/or use the invention. The Office Action asserts that “converting, interpreting, or otherwise transforming event drive code to serial execution code and back to event driven code is not disclosed in the specification.” During the personal interview with Examiner Queler on March 23, 2004, Examiner Queler clarified the rejection and indicated that claim 1 recited insufficient details of the “event-driven program” and that “converting” and “re-converting” were only problematic to the extent that “event-driven program” was allegedly inadequately recited. Therefore, claims 1 and 8 have been amended to more clearly recite the “event-driven program”.

The specification discloses “[w]hile composition space 1002 remains a serial execution environment 1005, the present invention provides an event driven model 1006 to ride on top of the serial environment 1005 ...” See specification at page 16, lines 17-19 and Fig. 2. The specification further discloses “... [b]y using the event driven model of the present invention, the distinction between the two scripting environments 1002 and 1003 is kept hidden from the designer, which in turn allows the designer to conceptualize the combination of the composition space 1002 and the interactions space 1003 as a single unified environment.” See specification at page 16, lines 25-28 and Fig. 2. Also, the specification discloses “... [w]hen requested by a browser in the interaction space 1003, the conceptual object  $O_A$  1009 moves through transition arrow 1011 to the interaction space 1003. for further modification or event handling, conceptual object  $O_A$  1009 moves through transition arrow 1012 back to composition space 1002 based on

an action or event having occurred in interaction space 1003.” Specification at page 17, lines 6-10 and Fig. 3. The specification also discloses, “this abstraction is referred to as a conceptual object as the designer may simplistically view the object as moving between spaces while the event model handles the complex coding to create the simplistic appearance of the transitioning object. The complex coding underlying the event model and the representation of an object moving between spaces is treated in greater detail below.” Specification at page 17, lines 11-15 and Fig. 3. The specification describes in detail the methods and systems for accomplishing the representation of the object through event-driven program presentation of serial execution code. See specification at page 17, line 16 – page 19, line 24. For example, the specification discloses, “the representation of text box 1023 is not a listing of HTML code, but rather a visual representation of the text box (in this example, a box with text in it).” Specification at page 17, lines 27-29.

Claims 1 and 8, as amended, more clearly and specifically recite “event-driven programs”. The “event-driven programs” are further disclosed in the specification as filed. It is therefore respectfully submitted that claims 1-16 are allowable. The rejection should be withdrawn.

Claims 1-16 were rejected under 35 U.S.C. 112, second paragraph as being indefinite because “due to the deficiencies in the disclosure it is not apparent how this claimed subject matter is possible.” The Office Action does not assert specific deficiencies. It is presumed that the rejection under 35 U.S.C. 112, second paragraph is on the same or substantially similar grounds as the rejection under 35 U.S.C. 112, first paragraph. The claims are allowable for at least the reasons set forth above. Therefore, this rejection should be either withdrawn or more specifically asserted.

Claims 1-4, 6-11, 13 and 14 were rejected under 35 U.S.C. 102(b) as being anticipated by Ingham ("W3 Objects: A distributed Object-Oriented Web Server", 6<sup>th</sup> International World-Wide Web Conference, April 1997). This rejection is respectfully traversed.

The Office Action asserts that Ingham discloses "W3Objects persist across requests, and that session-based state can be held internally." Based on this, the Office Action concludes that "this immediately implies that W3Objects operate on an event-driven basis." (See Office Action dated January 13, 2004, page 3). However, W3Objects persisting across requests and session-based states being held internally does not "immediately imply" that W3Objects operate on an event-driven basis as the Office Action asserts. Indeed, these two concepts are not even related. The Office Action merely asserts that one implies the other but fails to provide a rationale for this conclusion. In fact, Ingham fails to teach or suggest event-driven programs at all. Therefore, the Office Action fails to demonstrate that Ingham teaches or suggests claim 1 or 8. The rejection should be withdrawn.

The Office Action further asserts that Ingham "teaches the language known as W3Oscript, which encodes 'the presentation logic of a service in an interpreted language'," and that "the architecture supports arbitrary allocation of services to processes and processes to machines, in a manner which is completely transparent to users." Based on this, the Office Action concludes that "the W3Objects is able to translate back-and forth between event-driven programs and serial execution code." (See Office Action dated January 13, 2004, page 4).

However, the Office Action fails to demonstrate a relationship between the Ingham reference and the conclusion that "W3Objects is able to translate back-and-forth between event-driven programs and serial execution code." Ingham merely discloses objects (W3Objects) that represent Web resources. There is no teaching or suggestion at all in Ingham of event-driven

programs, serial execution code or converting event-driven programs into serial execution code at all. Even if the Office Action's assertions are correct in that Ingham discloses "the architecture supports arbitrary allocation of services to processes and process to machines, in a manner which is completely transparent to users," Ingham still fails to teach or disclose event-driven programs or converting event-driven programs into serial execution code.

Because Ingham fails to teach or suggest claim 1 or claim 8, it is respectfully submitted that the claims are allowable. The rejection should be withdrawn.

Claims 2-4, 6, 7, 9-11, 13 and 14 depend from claim 1 or claim 8 and are allowable for at least the reasons set forth above for claim 1 or claim 8.

Claims 15 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ingham. Claims 15 and 16 depend from claims 1 and 8, respectively and are allowable for at least the reasons set forth above for claims 1 and 8.

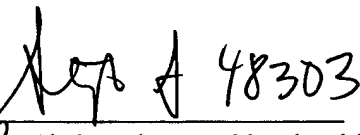
Claim 5 and 12 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ingham in view of Business Wire ("Next Microsoft 2: NeXT Software and Microsoft Corp. Q&A", Business Wire, March 1996). Claims 5 and 12 depend from claims 1 and 8, respectively. As set forth above, Ingham fails to teach or suggest claims 1 and 8. Business Wire fails to make up for the deficiencies of Ingham.

Similar to Ingham, Business wire fails to teach or suggest converting event-driven programs into serial execution code or reconverting serial execution code into event-driven programs. The Office Action asserts that Business Wire discloses "that WebObjects can generate pages containing applets such as ActiveX Controls." However, even if this contention is true, this disclosure still fails to disclose the claim elements of claim 1 or claim 8.

Because Ingham and Business Wire, either alone or in combination, fail to teach or suggest claims 1, 5, 8 and 12, it is respectfully submitted that claims 1, 5, 8, and 12 are allowable. The rejection should be withdrawn.

In view of the above, it is respectfully submitted that the application is now in condition for allowance. Reconsideration and prompt allowance are respectfully requested. If the Examiner feels that a telephone interview would be helpful in facilitating prosecution of the case, the Examiner is respectfully requested to contact the undersigned attorney of record to discuss the application.

Respectfully submitted,

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